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Attorneys *Specially Appearing* for Defendants  
AXUS STATIONARY (HONG KONG) LTD.,  
ANDRE VIEGAS, HIGHTON LTD., ROBERTA  
TRADING CORPORATION and KENPARK LTD

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

PRODUCTS AND VENTURES  
INTERNATIONAL,

Plaintiff,

v.

AXUS STATIONARY (SHANGHAI)  
LTD., AXUS STATIONARY (HONG  
KONG) LTD., SHANGHAI MARCO  
STATIONARY CO. LTD., SHANGHAI  
LAIKESHENG PEN MATERIAL CO.  
LTD. d/b/a/ SHANGHAI LEXON,  
PEIFENG XU, ANDRE VIEGAS,  
HIGHTON LTD., ROBERTA TRADING  
CORPORATION, and KENPARK LTD.

Defendants.

Case No.: 3:16-CV-669

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT**

**[SPECIAL APPEARANCE]**

Defendants Axus Stationary (Hong Kong) Ltd., Andre Viegas, Highton Ltd., Roberta Trading Corporation and Kenpark Ltd. (collectively, “the Defendants”) hereby specially appear in the above-captioned case for the limited purpose of filing this Stipulation for Extension of Time to Respond to Complaint. The Defendants’ special and limited appearance is not intended, and shall not be construed, as a waiver of any of the Defendants’ rights to challenge the jurisdiction of this Court or the sufficiency of service in this matter.

The Defendants and plaintiff Products and Ventures International have met and conferred and state the following:

Whereas, the Defendants have requested an extension of time for the Defendants to respond to the complaint in the above-captioned action and the plaintiff is willing to accommodate that request;

Therefore, pursuant to Civil Local Rule 6-1(a), the plaintiff and the Defendants, by and through their respective counsel, hereby stipulate and agree that the Defendants shall have an extension of time up to and including April 18, 2016 in which to respond to the complaint in this action.

**IT IS SO STIPULATED.**

Dated: March 21, 2016

GAW POE LLP

By: /s/ Randolph Gaw

Randolph Gaw  
Attorneys for Plaintiff  
PRODUCTS AND VENTURES  
INTERNATIONAL

Dated: March 21, 2016

HOGAN LOVELLS US LLP

Dated: 3/22/16



By: /s/ Mark C. Goodman

Mark C. Goodman  
Attorneys *Specially Appearing* for Defendants  
AXUS STATIONARY (HONG KONG)  
LTD., ANDRE VIEGAS, HIGHTON LTD.,  
ROBERTA TRADING CORPORATION and  
KENPARK LTD